



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 24, 2021

Application granted. Government to respond to complaint by August 27, 2021. Initial conference is adjourned from July 15, 2021 to September 17, 2021 at 12:45 p.m.
SO ORDERED.

Dated: 6/25/2021

P. Kevin Castel
United States District Judge

VIA ECF

Hon. P. Kevin Castel
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Zhu v. Renaud, et al.*, No. 21 Civ. 1598 (PKC)

Dear Judge Castel:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate her Application to Register Permanent Residence or to Adjust Status (Form I-485) and Refugee/Asylee Relative Petitions (Forms I-730). On behalf of the government, I write respectfully to request an on-consent extension of time of sixty days to respond to the complaint (*i.e.*, from June 28 to August 27, 2021). I also respectfully request that the initial conference presently scheduled for July 15, 2021, be adjourned to September 13, 2021, or thereafter.

The extension and adjournment are respectfully requested because, since the government’s April 15, 2021 letter, USCIS conducted interviews of the individuals present in the United States, after which it approved one of the Forms I-730 and issued a Request for Evidence relating to the Form I-485. Plaintiff’s counsel has informed me that he understands that his client anticipates responding to the RFE by the end of June. After USCIS has received and reviewed the RFE response and taken adjudicative action on the Form I-485, an interview may be scheduled for the overseas beneficiary of the remaining Form I-730. This is the government’s second request to extend the deadline to respond to the complaint and to adjourn the initial conference. Plaintiff consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney

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cc: Counsel of record (via ECF)